

UNITED STATES DISTRICT COURT
 for the
 Southern District of Ohio

In the Matter of the Search of

USPS Priority Mail Parcel 9114 9014 9645 1178 4746 49
 Addressed to "Justin Clifford, 1396 Summit St.
 Columbus, OH 43201-2539."

} Case No.

2:19-mj-805

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property

USPS Priority Mail Parcel 9114 9014 9645 1178 4746 49 Addressed to "Justin Clifford, 1396 Summit St. Columbus, OH 43201-2539."

located in the Southern District of Ohio, there is now concealed (*identify the person or describe the property to be seized*):

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of 21 U.S.C. 841(a)(1) and 843(b).

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

21 U.S.C. 841(a)(1)

Offense Description

Possession with intent to distribute a controlled substance

21 U.S.C. 843(b)

Prohibited use of a communication center (U.S. Mail)

The application is based on these facts:

See attached affidavit

- Continued on the attached sheet.
- Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Mohamed A. Sabrah
Applicant's signature

Mohamed A. Sabrah, U.S. Postal Inspector

Printed name and title



Sworn to before me and signed in my presence.

Date: 10/9/2019

City and state: Columbus, Ohio

Elizabeth A. Preston Deavers, U.S. Magistrate Judge

Printed name and title

V.N
(018/19)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN THE MATTER OF THE SEARCH OF)	Case Number <i>2:19-mj-865</i>
USPS Priority Mail Parcel)	
9114 9014 9645 1178 4746 49)	
Addressed to "Justin Clifford, 1396 Summit St.)	
Columbus, OH 43201-2539.")	

Affidavit in Support of Application for Search Warrant

I, Mohamed A. Sabrah, Postal Inspector, being duly sworn, depose and state as follows:

1. I have been a U.S. Postal Inspector for the U.S. Postal Inspection Service since February, 2016, enforcing federal mail and drug laws. I am currently assigned to Columbus, OH. I have received training at U.S. Postal Inspection Service National Training Seminars for mail-related criminal investigations and have investigated cases with other federal, state, and local law enforcement agencies. I have received an additional 40-hour Prohibited Mailings training by the U.S. Postal Inspection Service
2. The U.S. Postal Inspection Service is aware that drug traffickers have been using Priority Mail, a business-oriented service offered by the U.S. Post Office, to transport controlled substances and transfer funds, cash or otherwise, to further their enterprises. As a result of past investigations and prosecutions, the Postal Inspection Service has determined that a number of indicators can be used to identify packages containing contraband that have entered into the Priority Mail network. Inspectors routinely review shipment documents and Priority Mail packages originating from or destined to drug source areas, to identify instances where there is a possibility of drug trafficking.
3. On or about June 19, 2019, law enforcement officers in Michigan notified Inspectors in Columbus, OH of an on-going investigation, in which they identified a person using the name "Justin Clifford" located at "1396 Summit St. Columbus, OH 43201-2539" as a possible recipient of narcotics parcels through the U.S. Mail.
4. On July 10, 2019, Inspectors seized USPS Priority Mail parcel with tracking number 9505 5368 9784 6932 2343 13 destined to "Justin Clifford, 1396 Summit St. Columbus, OH 43201," and acquired search warrant number 2:19-mj-551 from the Southern District of Ohio. The search warrant was executed on the same day and the parcel was found to contain approximately 60 grams of a substance that field tested positive for cocaine.

5. On October 2, 2019, Inspectors seized USPS Priority Mail parcels with tracking numbers 9114 9014 9645 1178 4746 63, and 9114 9014 9645 1178 4746 32, destined to "Justin Clifford, 1396 Summit St. Columbus, OH 43201," and acquired search warrant 2:19-mj-798. The search warrant was executed on the same day and each parcel was found to contain approximately 407 grams of a substance that field tested positive for gamma-Hydroxybutyric Acid (GHB), a scheduled I substance. Clifford had a third parcel, which has tracking number 9114 9014 9645 1178 4746 49, that was also shipped to him at the same address from the same shipper and had similar characteristics of the previous two packages, that still had not arrived into Columbus, OH at the time search warrant 2:19-mj-798 was applied for; this third parcel is the subject parcel of the instant warrant.
6. On October 3, 2019, Inspectors intercepted USPS Priority Mail parcel with tracking number 9114 9014 9645 1178 4746 49, which was believed to contain narcotics due to the above mentioned information. Inspectors identified this parcel as a suspect drug parcel based on several characteristics, including but not limited to the type of mail, origin, destination, and size.
7. On October 3, 2019, Postal Inspectors took custody of USPS Priority Mail parcel with tracking number 9114 9014 9645 1178 4746 49, addressed to "Justin Clifford, 1396 Summit St Columbus, OH 43201", and bearing the return address of "Robert Breuer, Natural Homeopathy, 445 West 49th Street #4D New York, NY 10019."
8. Parcel 9114 9014 9645 1178 4746 49 is a white and red USPS Medium Flat Rate Priority Mail cardboard box weighing about 1 pound, and was mailed on October 1, 2019 from New York, NY 10019 with stamp postage affixed.
9. According to law enforcement databases, the delivery address of 1396 Summit St. Columbus, OH 43201-2539 does exist, and can be associated to Justin Clifford.
10. According to law enforcement databases, the return address of 445 West 49th Street #4D, New York, NY 10019 does exist, but Robert Breuer or the business Natural Homeopathy cannot be associated with that address.
11. I know that in the past, drug traffickers have used real names at legitimate addresses to receive parcels containing illegal narcotics, and have used non-existent addresses or addresses belonging to others for the sender/return address, in an attempt to legitimize the shipment in the event that the parcel is seized by law enforcement officers. Additionally, New York is a known source area for shipment of illegal narcotics to central Ohio as well as other areas of the United States.
12. On October 8, 2019, Postal Inspectors contacted Officer David Jones, Columbus Police Department, who is the handler for "Ayko," a drug detection dog most recently certified by the Ohio Peace Officers Training Council for the detection of cocaine, crack cocaine, heroin, methamphetamine, and their derivatives. K-9 "Ayko" has had 200 hours of training at Gold Shield Training Kennels, Blacklick, OH, a well-established and regarded training facility for police canines. Both in training and actual deployments, K-9 "Ayko" has successfully

detected narcotics, demonstrating clear, positive, aggressive alerts, and establishing himself as a highly reliable police dog.

13. The subject parcel was hidden among other packages, and "Ayko" was allowed to search the entire area. Officer Jones concluded that K-9 "Ayko" alerted positively to the U.S. Postal Service Mail parcel with tracking number 9114 9014 9645 1178 4746 49. Based on that alert, Officer Jones concluded that the odor of one of the drugs that K-9 "Ayko" is trained and certified to detect was present.
14. Based on the information contained herein, there is probable cause to believe that the USPS Priority Mail parcel bearing tracking number 9114 9014 9645 1178 4746 49 contains controlled substances and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b). Accordingly, I seek the issuance of a warrant to search the parcel for controlled substances to be seized.



Mohamed A. Sabrah
United States Postal Inspector

Sworn to before me, and subscribed in my presence, this 9th day of October, 2019 at Columbus, Ohio.



Elizabeth A. Preston Deavers
Honorable Elizabeth A. Preston Deavers
United States Magistrate Judge
Southern District of Ohio

